

## EXHIBIT "A"

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF QUEENS

MEGA FUNDING CORP.,

Plaintiff,

– against –

PEA CAB CORP. and PERSEFONE MANDELOS a/k/a  
PERSEFONE C. MANDELOS,

Defendants.

Index No. 707514/2019

**SUMMONS**

**Date filed:** April 29, 2019

To the above-named defendants:

You are hereby summoned and required to submit to plaintiff's attorney your answering papers on this motion within the time provided in the notice of motion annexed hereto. In case of your failure to submit answering papers, summary judgment will be taken against you by default for the relief demanded in the notice of motion.

The basis of the venue designated is the location of the Defendant's residence which is 199-56 21<sup>st</sup> Street, Whitestone, New York 11357

Dated: New York, New York  
April 29, 2019

ANDERSON KILL P.C.

By: /s/ Deborah B. Koplovitz

Deborah B. Koplovitz

Attorneys for Plaintiff

1251 Avenue of the Americas, 42<sup>nd</sup> Floor  
New York, New York 10020  
(212) 278-1000

TO: Persephone Mandelos  
199-56 21<sup>st</sup> Street  
Whitestone, New York 11357



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**NOTICE OF MOTION  
FOR SUMMARY  
JUDGMENT IN LIEU  
OF COMPLAINT****COMMERCIAL  
DIVISION**

PLEASE TAKE NOTICE that upon the Summons dated April 29, 2019, and upon the annexed affidavit of SAVAS KONSTANTINIDES sworn to on May 10, 2019 and upon the Memorandum of Law, the plaintiff will move this court, on July 23, 2019 at **COMMERCIAL DIVISION PART 33, Room 122**, of the Supreme Court of the State of New York, County of Queens, 88-11 Sutphin Boulevard, Queens, New York at 9:30 a.m., for an order directing the entry of judgment for the plaintiff and against the defendant in the amount of \$ 640,942.82 through May 3, 2019 with interest thereon from May 3, 2019, and for such other and further relief as to the court may deem just and proper, plus the costs of this motion, on the ground that no triable issue of fact exists in this action which has been commenced pursuant to CPLR § 3213, as there are no defenses to this action which is for the payment of money only, and for such other and further relief as to this Court may deem just and proper.

PLEASE TAKE FURTHER NOTICE that, pursuant to CPLR 2214(b), answering affidavits, if any, must be served so as to be received in hand at least seven days prior to the return the date of this motion.

Dated: New York, New York  
May 10, 2019

ANDERSON KILL P.C.

By: /s/ Deborah B. Koplovitz  
Deborah B. Koplovitz  
Attorneys for Plaintiff  
1251 Avenue of the Americas, 42<sup>nd</sup> Floor  
New York, New York 10020  
(212) 278-1000